

**From:** [HarborComments](#)  
**To:** [PortlandHarbor](#)  
**Subject:** Attn: Portland Harbor Superfund Comments, Reject Proposed Changes  
**Date:** Tuesday, December 18, 2018 11:25:06 PM

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**From:** (b) (6)  
**Sent:** Tuesday, December 18, 2018 7:08 PM  
**To:** HarborComments <HarborComments@epa.gov>  
**Subject:** Attn: Portland Harbor Superfund Comments, Reject Proposed Changes

Dear Environmental Protection Agency,

I am writing to urge you to reject proposed changes to the 2017 Portland Harbor Superfund Cleanup Plan. The public has endured 16 years of public process waiting for the cleanup to begin. It is time to move forward by implementing the plan as written, that is, without changes that would leave people, fish, and wildlife exposed to carcinogenic chemicals in Portland Harbor unnecessarily and indefinitely.

I am particularly concerned that the EPA is now proposing to eliminate the removal of approximately 17 acres of highly contaminated river bottom at the NW Natural "GasCo Site" and the Port of Portland's "Terminal 4" as required in the 2017 plan. That the EPA must readdress and reject this change of course seems imperative for many obvious and critical reasons:

- 1) Leaving these contaminants in the river at the "GasCo site" and "Terminal 4" means that people and wildlife will continue to be at risk of exposure for an indefinite period of time. There is inadequate information about how these contaminants may migrate in our river over time and how they may interact with other toxic contaminants in the river.
- 2) The procedure that EPA used to make these changes was done outside the normal process for amending a Cleanup Record of Decision and sets a bad precedent for other polluters to request changes to the cleanup plan in the future.
- 3) The changes were not developed through a transparent inclusive process, but rather based on behind the scenes lobbying by two influential responsible parties with a long track record of advocating for a weak cleanup plan that prioritizes reduced polluter costs over public and environmental health. NW Natural and the Port of Portland have been two of the most aggressive advocates for a weaker cleanup plan and the proposed changes will save them \$35 million in cleanup costs at the expense of the project's integrity.
- 4) In 2017, the EPA chose a cleanup alternative that was far weaker than what the vast majority of the public who commented on the cleanup options supported. The changes being proposed now weaken that plan even further.

It's time for the EPA to move forward with the cleanup plan that was adopted, not work behind the scenes with polluters to weaken the plan. Implementation of the plan is already behind schedule. I appreciate that EPA has recently sent a strong message to responsible parties that they need to

move forward expeditiously to develop cleanup agreements and start the cleanup process. However, the proposed changes at this late stage in a process can only further undermine public confidence in the EPA's role and its commitment to ensure public health and environmental sanity.

Sincerely,

(b) (6)

Portland, OR 97266